

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INDIAN HARBOR INSURANCE COMPANY,)
a North Dakota Corporation,)
) No. 08 CV 3543
Plaintiff,)
) Judge Lefkow
vs.)
) Magistrate Judge Mason
2930 NORTH SHERIDAN, LLC,)
an Illinois Limited Liability Corporation,)
)
Defendant.)

**MOTION FOR EXTENSION OF TIME FOR
DEFENDANT, 2930 NORTH SHERIDAN, LLC, TO ANSWER OR
OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT**

Defendant, 2930 North Sheridan, LLC (“Sheridan”), by and through its attorneys, Asperger Associates LLC, hereby moves this Court for the entry of an Order granting Sheridan an additional thirty (30) days (or up to and including August 13, 2008) within which to file its answer or otherwise plead in response to Plaintiff’s Complaint. In support of this Motion, Sheridan states as follows:

1. On June 20, 2008, Plaintiff Indian Harbor Insurance Company (“Indian Harbor”) filed its Complaint against Sheridan.
2. The return of service in the electronic docket indicates that Sheridan was served with Plaintiff’s Complaint on June 23, 2008. Thus, under the applicable rules, Sheridan’s responsive pleadings would be due on Monday, July 14, 2008.
3. At this time, Sheridan and its attorneys are still investigating the claims asserted in the Plaintiff’s Complaint. The purpose of this Motion is to permit Sheridan and its attorneys

sufficient time to secure the necessary information and documentation to appropriately respond to Plaintiff's Complaint.

4. Further, Sheridan's lead attorney on this matter, Jeffrey J. Asperger, is scheduled to be on trial during the weeks of July 28, 2008 and August 4, 2008.

5. Counsel for Sheridan has communicated with counsel for Plaintiff and has confirmed that Plaintiff's counsel does not object to the requested extension.

6. Sheridan states that this Motion is not interposed for any inappropriate or improper purpose.

7. Finally, Sheridan states that it reasonably believes that neither this Court, nor the Plaintiff, will be prejudiced in any way by the requested extension, and that the requested extension will not cause any undue delay.

WHEREFORE, 2930 North Sheridan, LLC, respectfully requests that this Court enter an Order granting 2930 North Sheridan, LLC an additional thirty (30) days (or up to and including August 13, 2008) to answer or otherwise plead in response to Plaintiff's Complaint.

Dated: July 14, 2008

Respectfully submitted,

2930 NORTH SHERIDAN, LLC

By: /s/ Jeffrey J. Asperger
One of its attorneys

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